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7 Attorney for Mary Ellen Martinez

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 MARY ELLEN MARTINEZ,
15 Defendant.

Case No. 2:16-CR-0322-KJD-CWH

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(Third Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Jim W. Fang, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Jacquelyn N.
20 Witt, Assistant Federal Public Defender, counsel for Mary Ellen Martinez, that the Revocation
21 Hearing currently scheduled on September 14, 2022 at 11:00 am, be vacated and continued to
22 a date and time convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

24 1. The parties have engaged in meaningful negotiations but have been unable to
25 attain a joint recommendation thus far.
26

2. Therefore, defense counsel is conducting mitigation investigation and requires additional time to gather supporting documents.

3. Defense counsel needs additional time to conduct investigation and prepare, if necessary, for the revocation hearing.

4. Ms. Martinez is in custody and agrees with the need to continue the revocation hearing.

5. The parties agree to the continuance.

This is the third request for a continuance of the revocation hearing.

DATED this 8th day of September, 2022.

RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

/s/ Jacquelyn N. Witt
By _____
JACQUELYN N. WITT
Assistant Federal Public Defender

/s/ Jim W. Fang
By _____
JIM W. FANG
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MARY ELLEN MARTINEZ,

7 Defendant.

Case No. 2:16-CR-0322-KJD-CWH

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 Wednesday, September 14, 2022 at 11:00 a.m., be vacated and continued
12 to November 9, 2022 at the hour of 11:00 a.m.; or to a time and date convenient to the court.
13 in courtroom 4A.

14 DATED this 9th day of September, 2022.

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17 UNITED STATES DISTRICT JUDGE